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March 1, 2013

VIA ECF

Honorable Joan M. Azrack  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Jorge Carmona, et al. v. 30th Ave. Palace Food Corp., et al.*  
11 Civ. 5064 (JBW) (JMA)

Dear Magistrate Judge Azrack:

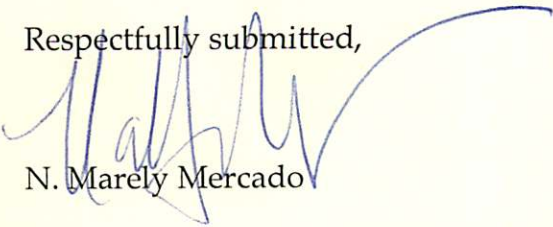
We are the attorneys for plaintiffs in the above-referenced matter and we write on behalf of both parties to respectfully request that this Court extend the time the parties have to complete discovery, due by March 4, 2013, by 60 days.

This is the parties' second request for an extension of time to complete discovery. To date, the depositions of defendant Jack Brucculeri and plaintiffs Felix Fernandez, Besnik Sejdej, and Nail Husic have been taken. The deposition of defendant Rocco Sacramone is scheduled to take place March 5, 2013. The defendants expect to depose additional plaintiffs thereafter.

The parties have engaged in several settlement discussions and believe that additional depositions will allow time for the parties to further narrow their settlement positions.

In addition, the parties respectfully request an adjournment of the telephone conference scheduled with Your Honor for Monday, March 4, 2013 at 11:15 a.m., to a date at least 60 days thereafter.

Respectfully submitted,



N. Marely Mercado

Cc: Evangelos Michailidis, Esq., Attorney for Defendants (by email)